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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK ANTHONY DUNNE; AUDREY)
GRACE FITZSIMMONS,)
Plaintiffs,)
vs.)
DEPARTMENT OF HOMELAND)
SECURITY; ATTORNEY GENERAL)
ERIC H. HOLDER, JR.; IMMIGRATION)
AND CUSTOMS ENFORCEMENT;)
TIMOTHY S. AITKEN,)
Defendants.)

) Case No. 3:10-cv-05636-EMC
STIPULATION TO EXTEND DATES
AND [PROPOSED] ORDER

Plaintiffs, by and through his attorneys of record, and Defendants, by and through their attorneys of record, stipulate to the following:

1. Plaintiffs filed a complaint in this action on December 13, 2010. Plaintiffs perfected service on January 21, 2011. Defendants' original deadline to answer or respond was March 22, 2011. This Court granted two extensions until May 12, 2011.

2. The Defendants are still in the process of gathering information and documents, and determining their position on this case, and require additional time to complete these tasks before filing an answer or responsive pleadings.

3. Therefore, the parties hereby respectfully request this Court to order a twenty-one day

STIPULATION FOR EXTENSION OF TIME
Case No. C 10-5636

1 extension of time within which the Defendants must serve their response in the above-entitled
2 action. Defendants will file their response on or before May 19, 2011.

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4 Respectfully submitted,

5 Dated: May 11, 2011

6 s/ Katherine E.M. Goettel
7 KATHERINE E.M. GOETTEL
8 Trial Attorney
9 United States Department of Justice
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District Court Section
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12 Dated: May 11, 2011

13 s/ James M. Byrne
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17
18
19 ORDER

20 Pursuant to stipulation, IT IS SO ORDERED.

21 Date: May 12, 2011

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27 STIPULATION FOR EXTENSION OF TIME
28 Case No. C 10-5636



CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify this document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

Dated: May 11, 2011

/s/ Katherine E.M. Goettel
KATHERINE E.M. GOETTEL